



# City of Portland Oregon

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SEP 27 2010

Environmental  
Cleanup Office

September 22, 2010

Deb Yamamoto  
U.S. Environmental Protection Agency  
Region 10  
1200 6th Ave, Suite 900, ECL-115  
Seattle, WA 98101-3140

Re: City of Portland Concerns with Harbor Oil Draft Remedial Investigation and Risk Assessment Reports

Dear Ms. Yamamoto:

The City of Portland (City) received Christopher Cora's August 17, 2010 letter sent in response to the City's July 27, 2010 letter expressing our concerns about the adequacy of the Harbor Oil remedial investigation (RI) and human health and ecological risk assessments (RAs). We were also notified that the "Harbor Oil Draft Final Remedial Investigation and Risk Assessment Reports" were available for review on September 2, 2010. Mr. Cora has requested comments on the Draft Final RI and RAs reports by October 1, 2010, (b) (6)

Given the complexities at the Harbor Oil site and the concerns expressed by the City and Yakama Nation regarding the adequacy of the investigation and assessment of the site, we request that EPA initiate discussions in the near future with city, state, and tribal government representatives to resolve the issues raised before EPA issues comments or approval the September 2010 Draft Final RI and RAs reports.

The City also requests that EPA grant a 120 day extension for review comments on the Draft Final RI and RAs reports. An extension for comments will provide an adequate period for a thorough review of the reports and discussion and resolution of outstanding issues, before EPA comments are issued or the final RI documents are issued.

The City of Portland remains concerned that the incomplete site characterization and data evaluation may result in underestimating off-site contaminant impacts; potential risks to human health and ecological receptors; and the potential risk of recontamination of the wetlands and Force Lake. In addition, Mr. Cora's response to our letter raises additional concerns the regarding the RI and RA process and inconsistencies in the EPA's requirements between the Harbor Oil and Portland Harbor Superfund sites.

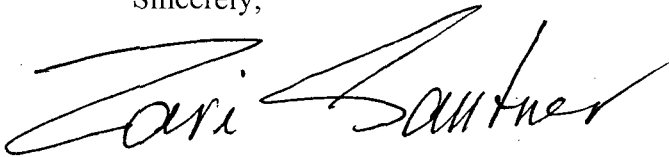


In summary, we do not believe that the draft RI and RAs are based upon adequate characterization and assessment, address State laws and stakeholder concerns, or provide a solid foundation for a Feasibility Study or other site decisions.

The City appreciates the opportunity to provide these comments and to collaborate with EPA to ensure a comprehensive evaluation of the Harbor Oil Superfund Site. Portland has adopted watershed goals that seek to restore and enhance watersheds for ecological health and the health and enjoyment of our citizens and remediation of the Harbor Oil site should be consistent with those goals.

We look forward to your response and the working towards resolution of the issues regarding this site.

Sincerely,



Zari Santner, Director  
Portland Parks and Recreation



Dean Marriott, Director  
Bureau of Environmental Services

Cc:

Dan Saltzman, COP Commissioner  
Nick Fish, COP Commissioner  
Jan Betz, COP Attorney's Office  
Harry Auerbach, COP Attorney's Office  
Chris Cora, EPA Region 10  
Bruce Gilles, ODEQ  
Paul Siedel, ODEQ  
Mark Stephan, HOCAG  
David Farrar, DHS  
Rose Longoria, Yakama Nation  
Tom Calabrese